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Attorneys for Plaintiff  
MARCIE HAMILTON

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MARCIE HAMILTON,

Plaintiff,

vs.

JUUL LABS, INC.,

Defendant.

Case No. 3:20-CV-3710-EMC

**DECLARATION ATTACHING PAGA  
NOTICES IN ANTICIPATION OF  
OCTOBER 22, 2020 JOINT CASE  
MANAGEMENT CONFERENCE**

Date: October 22, 2020  
Time: 9:30 a.m.  
Dept: Courtroom 5, 17<sup>th</sup> Floor  
Judge: Honorable Edward M. Chen

Attached to this declaration as Exhibits 1 and 2 are PAGA notices my firm filed with the LWDA on August 27 and September 29, 2020. These notices include facts and claims that will be alleged in Plaintiff's proposed amended complaint. The exhaustion periods have not all run with respect to these notices. I declare, under penalty of perjury, under the laws of California, that this declaration is true. I e-signed this declaration on October 15, 2020 in San Francisco.

**Chris Baker**

# EXHIBIT 1



**BAKER CURTIS &  
SCHWARTZ PC**

Chris Baker  
1 California Street, Suite 1250  
San Francisco, CA 94111  
tel. (415) 433-1064  
[cbaker@bakerlp.com](mailto:cbaker@bakerlp.com)  
[www.bakerlp.com](http://www.bakerlp.com)

August 27, 2020

**Via On-Line Portal**

Labor & Workforce and Development Agency (LWDA)  
Attention: PAGA Administrator

**Via Certified Mail**

Jerry Masoudi  
Chief Legal Officer  
JUUL Labs, Inc.  
1000 F Street NW  
Washington, D.C., 20004

*RE: Request For Relief Under the Private Attorneys General Act*

Dear LWDA and Mr. Masoudi:

This office represents Marcie Hamilton. This PAGA notice follows, and, to the extent necessary or appropriate, amends the PAGA notices dated and filed on August 14, 2019 and June 4, 2020. This PAGA notice is intended to “relate back” to these prior PAGA notices, as permitted by the LWDA (which allows for the filing of amended PAGA notices) and California law. *E.g., Brown v. Ralph’s Grocery Company*, 28 Cal.App.4<sup>th</sup> 824, 841-842 (2018). To the extent it should be determined that this notice does not “relate back,” this should be considered a new PAGA notice.

As explained in the prior PAGA notices, JUUL – through its policies, practices, and agreements – engages in conduct that violates the Labor Code. To further expound on what has already been stated, and among other things:

1. JUUL has and maintains culture, conduct, social media, communications, security and other policies and rules that violate the law (collectively “confidentiality policies”). These policies set forth detailed information about employee working conditions and wages, including, but not limited to, information about paydays, overtime, benefits and other employment matters.

LWDA & JUUL Labs, Inc.

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JUUL prohibits employees from disclosing any of this information, and expressly describes this information as “confidential.” For example, the JUUL handbook states: “You understand that the working conditions, policies, procedures, appeal processes, and benefits described in this handbook are confidential and may not be distributed in any way nor discussed with anyone who is not an employee of JUUL Labs, Inc.”

2. JUUL’s policies place limits on the information that employees may convey electronically. Its conduct and social media policies and rules advise employees that JUUL “should not be held liable for any repercussions that the employee’s [social media communications] may generate.” Information about wages, working conditions, and illegal conduct can generate “repercussions” to JUUL and create liability to JUUL.

3. JUUL’s conduct and other confidentiality policies prohibit employees from sharing or discussing business information publicly, regardless of whether or not it is designated as confidential. JUUL’s policies also prohibit employees from sharing or discussing “non-public data belonging to JUUL Labs.” JUUL further instructs employees that if they have to “think about sharing” information, then they should not share the information.

4. JUUL’s conduct and other policies and rules prevent employees from communicating with persons in the investment, regulatory, and trade communities. Employees are instructed to not respond to inquiries from these communities, including government regulators, but to instead direct or defer these inquiries to a designated JUUL representative.

5. JUUL’s communication and other confidentiality policies and rules are intended to prevent employees from disclosing information in a written or recorded form because such information may be subject to discovery in litigation or may be sought by or reviewed by government regulators. Employees have been, and on information and belief are still, instructed by senior executives to not relay information in a recorded form, particularly information about potential or actual illegal conduct or the public health dangers of JUUL’s products. Employees were instructed to rewrite or delete written materials to conceal information about potential or actual illegal conduct. Hamilton experienced this conduct first-hand from senior executives. As further explained in a recent news report: “Lawyers sent periodic reminders to staff members telling them not to put anything in writing that could be communicated in person.” L. Etter, JUUL Quietly Revamped Its E-Cigarette, Risking the FDA’s Rebuke (Bloomberg Businessweek, July 23, 2020) (“Etters Article.”)

6. JUUL’s information technology, security, and other policies set forth further violations of the Labor Code. For example, these policies define “Technology Resources” to include “all means of electronic communication that are owned by JUUL Labs,” and all personal devices accessed or used on JUUL’s premises and all personal devices that are used in performing JUUL business. Thus, JUUL’s policies place illegal limits on the use of both work and personal communication devices. JUUL prohibits employees from using these “Technology Resources:” (1) in a manner contrary to JUUL’s interests; (2) in any way that discloses JUUL’s so-called confidential or proprietary information to third parties, or for personal or pecuniary

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gain; or (3) to transmit, receive, or store information that is adverse to JUUL or any other entity. JUUL also prohibits employees from accessing JUUL's so-called confidential information in the presence of "unauthorized individuals" and it prohibits employees from storing information in a fashion that permits "unauthorized access."

7. Following increased scrutiny of JUUL by the Food and Drug Administration (FDA) in 2018, as well as by other government agencies, JUUL's executive office took steps to further "tighten" its confidentiality policies, practices, NDAs, and other employment and severance agreements in a manner that violates the California Labor Code and other laws. JUUL's purpose was to make it less likely that employees would disclose information about JUUL's working conditions, wages, and illegal conduct. JUUL knew that its confidentiality policies and agreements were illegal, and knew that its revisions "tightening" these policies and agreements were also illegal, but made the revisions anyway to "protect the company."

8. JUUL informs employees that if they fail to comply with JUUL's policies, they may be subject to discipline, up to and including termination. JUUL informs employees that compliance with JUUL's policies is a condition of their employment.

In addition, JUUL, through its confidentiality policies, rules, and practices (including trainings), has also adopted and enforced illegal policies, rules, and other prohibitions on speech, including about wages, working conditions, and internal and external whistleblowing, in violation of the Labor Code. Among other things:

1. JUUL has numerous training courses through which employees are instructed to not engage in whistleblowing or other protected speech. These instructions violate the Labor Code.

2. JUUL actively prepared for unannounced government inspections of its offices by running "drills" in which employees were instructed to quickly conceal incriminating evidence and information upon receiving notice that a regulator or government agency was on-site.

3. JUUL's executives and officers instructed employees to not speak to government regulators unless they had no choice. These instructions were given during, among other things, all-hands meetings. Employees were also instructed, if they were approached by a government regulator, to direct the government regulators to specifically-identified individuals. These individuals were, in turn, trained to conceal information from government regulators while being "technically" truthful. Hamilton has first-hand knowledge of this conduct. In addition, as explained in the Etters Article:

More than a dozen JUUL employees were schooled using a technique called "hats on-hats off." . . . During hats on, a designated person would play the role of an FDA inspector, asking probing questions. That was followed by hats off, in which the person evaluated the performance of the employee and offered tips

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to doing better. Employees were coached on specific FDA techniques they were told might be used to try to get them to talk more than they should. In at least one coaching session that included JUUL's chief quality officer, Joanna Engelke, employees were instructed on how to respond to questions about device modifications. If asked, acknowledge the changes, they were told. But don't volunteer any information.

4. JUUL policies and practices included instructing JUUL's employees to inform government regulators, other employees, and others that JUUL did not target its products to minors, and to thus conceal and not disclose information that JUUL did, in fact, target its products to minors in violation of the law.

5. Following the FDA raid on JUUL's headquarters, employees were instructed via email, through all-hands meetings, and otherwise to not speak to the press or others about JUUL. These admonitions were repeated following Altria's investment in JUUL.

6. JUUL further enforced its policies and rules against internal and external whistleblowing by taking adverse action against employees who engaged in conduct protected by Labor Code § 1102.5. For example, Hamilton disclosed information internally about violations of, and non-compliance with, the law with respect to JUUL's products, testing on employees, safety and clinical practices, and the shipping of products. She disclosed this information internally to her superiors, as well as to persons at JUUL in a position to investigate and/or correct the problem. She sometimes communicated this information in writing, in violation of JUUL's policies. In response, JUUL retaliated against her as part of its enforcement efforts with respect to its illegal policies against whistleblowing. On information and belief, JUUL has retaliated against other employees as part of its enforcement of its illegal policies. These other employees include, but are not limited to, Siddharth Breja.

The above policies and practices provide further evidence that JUUL's NDAs and other agreements are intended to, and should be construed to, violate the Labor Code.

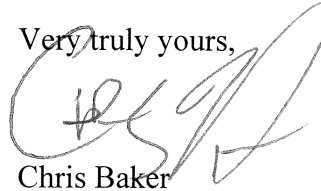
The specific provisions of the Labor Code alleged to have been violated by the above conduct (as well as the conduct set forth in the prior PAGA notices) include Labor Code §§ 96(k), 98.6, 232, 232.5, 432.5, 1102.5, and 1197.5. Hamilton is aggrieved by one or more of JUUL's violations of these Labor Code provisions.

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For these violations, Hamilton seeks civil penalties on behalf of herself and all other aggrieved employees (including temporary employees), as well as the State of California, in accordance with Labor Code §§ 2699 *et seq.*

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "CB", is written over the typed name "Chris Baker".

Chris Baker

cc: Brian Johnsrud; Jennifer Lotz

# EXHIBIT 2





**BAKER CURTIS &  
SCHWARTZ PC**

Chris Baker  
1 California Street, Suite 1250  
San Francisco, CA 94111  
tel. (415) 433-1064  
[cbaker@bakerlp.com](mailto:cbaker@bakerlp.com)  
[www.bakerlp.com](http://www.bakerlp.com)

September 29, 2020

**Via On-Line Portal**

Labor & Workforce and Development Agency (LWDA)  
Attention: PAGA Administrator

**Via Certified Mail**

Jerry Masoudi  
Chief Legal Officer  
JUUL Labs, Inc.  
1000 F Street NW  
Washington, D.C., 20004

*RE: Request For Relief Under the Private Attorneys General Act  
On Behalf of Marcie Hamilton and James Isaacson*

Dear LWDA and Mr. Masoudi:

This office represents Jim Isaacson in addition Marcie Hamilton with respect to the PAGA claims against JUUL Labs, Inc. Mr. Isaacson – while a resident of Utah -- was based out of JUUL's San Francisco office, had a desk in California, and regularly traveled and worked in the geographic boundaries of California. At the time of his employment, JUUL was based in California and JUUL's illegal conduct originated in and emanated from California. Mr. Isaacson is entitled to the protection and benefits of California law. He worked for JUUL from May 2018 to November 1, 2019.

Mr. Isaacson seeks to join Ms. Hamilton as a PAGA representative with respect to her and the State's claims against JUUL Labs, Inc. Through this PAGA notice, Mr. Isaacson hereby incorporates by reference Ms. Hamilton's prior PAGA notices (with attachments) as to JUUL, including those dated August 15, 2019, June 4, 2020, and August 27, 2020. Isaacson hereby incorporates by reference the facts, theories, and Labor Code sections set forth in those notices, which are already in the possession of the State and JUUL.

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This PAGA notice – provided on behalf of both Isaacson and Hamilton – follows, supplements, and, to the extent necessary or appropriate, amends Ms. Hamilton’s prior PAGA notices. This PAGA notice is intended to “relate back” to those prior PAGA notices, as permitted by the LWDA (which allows for the filing of amended PAGA notices) and California law. *E.g., Brown v. Ralph’s Grocery Company*, 28 Cal.App.4<sup>th</sup> 824, 841-842 (2018). To the extent it should be determined that this notice does not “relate back,” this should be considered a new and additional PAGA notice.

As explained in the prior PAGA notices, JUUL – through its policies, practices, and agreements – engages in conduct that violates the Labor Code. To further expound on what has already been stated, and among other things:

1. JUUL trained employees on how to avoid the disclosure of factual information to government agencies, including, but not limited to, the FDA. The training involved, for example, the manner in which employees should avoid disclosing information about design changes to its products, including its gasket and pressure sensors,

2. JUUL’s official policy was to permit employees to vape in the workplace. JUUL then stated this was no longer its policy, but at the same time encouraged employees to continue vaping in the workplace. For example, at an all-hands meeting after the announcement of the vaping “ban,” JUUL’s head of Human Resources conspicuously vaped while conducting a presentation to JUUL’s workforce.

3. JUUL engaged in other reasonably-suspected illegal conduct. This included, but was not limited to: (a) making changes to its products in violation of the FDA’s deeming rule; (b) concealing these changes; (c) refusing to document its compliance with applicable policies and regulations (and/or failing to comply at all); (d) rushing potentially unsafe products to market; (e) testing its products on human subjects, (f) continuing to permit vaping in the workplace; and (g) engaging in other gross violations of workplace safety rules, including storing jugs of cancer-causing chemicals in unsecure areas. Isaacson disclosed information about this illegal conduct. Consistent with the adoption and enforcement of its policy against whistleblowing, JUUL took adverse action against Isaacson.

4. JUUL prohibited employees from disclosing JUUL’s illegal marketing of its products to young people. Instead, JUUL actively instructed employees to falsely claim that JUUL did not target its products to young people. Many employees believed JUUL’s lies. For example, in the fall of 2018, Isaacson, believing he was employed by a company focused exclusively on harm reduction, wore a JUUL-branded sweatshirt<sup>1</sup> to his daughter’s college campus during a parents weekend. Isaacson found it noteworthy that the sweatshirt was immensely popular amongst college students, and not so popular with his fellow parents. He reported this problem – and the problem of JUUL’s marketing practices – to his superiors at JUUL. He was subsequently given a poor performance review.

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<sup>1</sup> JUUL provides its employees with many types of JUUL-branded employee “swag.”

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5. JUUL has made, adopted and enforces illegal rules, regulations, policies and practices. These illegal requirements inform the understanding and meaning of JUUL's illegal non-disclosure agreements. These illegal requirements are sometimes described as policies ("POL"), standard operating procedures ("SOP") and work instructions ("WI"). As previously noted, JUUL "tightened" its illegal prohibitions on competition, whistleblowing, and freedom of speech – with full knowledge that doing so was illegal. JUUL tracks its employees with respect to their review and acknowledgement of certain of its illegal requirements. The requirements at issue include (but are not limited to) those set forth in Exhibit A. For example, on information and belief, the illegal requirements include:

- a) JUUL Quality Policy
- b) Regulatory Agency Inspections Procedure
- c) Managing Requests for Regulatory Agency Inspections Work Instruction
- d) JUUL Information Security Policy Framework
- e) Promotional and Informational Review Committee (PIRC) Policy
- f) Complaint Handling Procedure
- g) Youth Prevention Training Certification
- h) External Communication Policy
- i) Social Media Policy
- j) Privacy and Data Handling Policy
- k) JUUL Labs Code of Conduct
- l) Record Retention Procedure
- m) Compliance Reporting and Investigation Policy
- n) Good Documentation and Communication Practices
- o) Security Awareness Training
- p) Record Retention Procedure
- q) Dimensions of Data Privacy
- r) Quality Manual
- s) Document Control Procedure
- t) Use of Electronic Data Systems
- u) Regulatory Reporting Requirements
- v) Documentation and Records Retention
- w) JUUL Team Training

6. JUUL also has made, adopted and/or enforces rules, regulations, and policies that control or direct (or tend to control or direct) the political activities or political action of their employees. JUUL also seeks to unlawfully coerce and/or influence its employees with respect to their political action and/or political activity. This is a violation of Labor Code § 1101 and 1102. Among other things, JUUL's practices and business, the value and/or detriments of vaping, and the necessity or appropriateness vaping-related regulations, are all high profile political issues. Nonetheless, JUUL instructs employees they cannot – among other things – correct political candidates spreading alleged "misinformation" about JUUL, "engage with youth on the topics of tobacco and nicotine," "engage in social media," discuss vaping, cigarettes, drinking, or any age-

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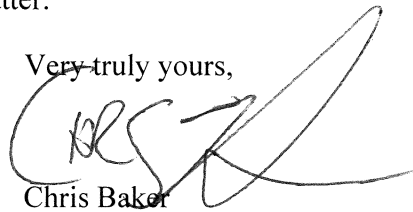
restricted products in the “earshot of youth,” share or laugh at JUUL Labs-related memes, or help a young family member quit smoking.

7. On or around October 15, 2019, JUUL required Isaacson to sign a “Separation Agreement and Release” in exchange for continued employment through November 1, 2019 and other consideration. This agreement was in material respects the same as the one offered to Hamilton. The separation agreement contained numerous provisions illegal under California law, including under Government Code § 12964.5. The illegal provisions included a non-disparagement provision and a release of claims under the Fair Employment and Housing Act. This agreement was illegal, and JUUL knew it to be so.

In light of the above-referenced facts and theories (as well as those set forth in the prior PAGA notices), JUUL has violated Labor Code §§ 96(k), 98.6, 232, 232.5, 432.5, 1101, 1102, 1102.5, and 1197.5. For these violations, as well as those set forth in Hamilton’s prior PAGA notices, Hamilton and Isaacson seek civil penalties on behalf of themselves and all other aggrieved employees (including temporary employees), as well as the State of California, in accordance with Labor Code §§ 2699 *et seq.*

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris Baker", with a large, sweeping flourish extending to the right.

Chris Baker

cc: Brian Johnsrud; Jennifer Lotz

Exhibit A

Username	First Name	Last Name	Course Title	Course Percentage	Course Complete?	Date Course Completed	Course Overdue?
marcie@juul.com	Marcie	Hamilton	JUUL Quality Policy	100	YES	6/3/18	No
marcie@juul.com	Marcie	Hamilton	SOP-00027 Rev A: Training Procedure	100	YES	7/15/18	No
marcie@juul.com	Marcie	Hamilton	JUUL Quality System Overview	100	YES	7/15/18	No
marcie@juul.com	Marcie	Hamilton	POL-00002 Rev A: Purchasing Policy	100	YES	7/15/18	No
marcie@juul.com	Marcie	Hamilton	SOP-00042 Rev A: Contract Management Procedure	100	YES	8/22/18	No
marcie@juul.com	Marcie	Hamilton	SOP-00037 Rev A: Record Retention Procedure	100	YES	9/25/18	No
marcie@juul.com	Marcie	Hamilton	POL-00002 Rev B: Purchasing Policy	100	YES	10/24/18	No
marcie@juul.com	Marcie	Hamilton	POL-00009 Rev A: Travel and Expense (T&E) Policy	100	YES	10/24/18	No
marcie@juul.com	Marcie	Hamilton	POL-00007 Rev A: Compliance Reporting and Investigation Policy	100	YES	11/13/18	No
marcie@juul.com	Marcie	Hamilton	POL-00010 Rev A: Global Anti-Bribery Anti-Corruption Policy	100	YES	12/3/18	No
marcie@juul.com	Marcie	Hamilton	WI-00029 Rev A: SKU Request Work Instruction	100	YES	12/3/18	No
marcie@juul.com	Marcie	Hamilton	SOP-00032: SS 401 - Investigator Selection and Qualification	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00031: SS 402 - Site Enrollment and Initiation	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00030: DM 701 - Clinical Data Management	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00029: DM 702 - Use of Electronic Data Systems	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00028: RA 202 - Regulatory Submissions	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00020: RA 203 - Regulatory Reporting Requirements	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00019: QA 801 - Quality Assurance Audits	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00018: QA 802 - Regulatory Inspections	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00017: CP 301 - Clinical Protocol Development	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00016: CP 302 - Investigational Plan and Report of Prior Investigations	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00015: PM 504 - Study Closeout Visit	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00014: PM 505 - Ensuring Investigator Compliance	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00004: PM 501 - Investigational Product Management	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00003: GA 105 - Outsourcing	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00002: GA 101 - Overview of JUUL Responsibilities and Delegation	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00008: +Documentation and Records Retention - Regulatory	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00009: +Regulatory Authority Contacts and Meetings	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00010: +PM 503 - Monitoring Clinical Investigations	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00011: +GA 104 - Conflict of Interest Disclosure Requirements	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00012: +GA 103 - JUUL Team Training	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00013: +GA 102 - Document Development and Change Control	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00021: +SM 603 - Subject Eligibility and Enrollment	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00022: +SM 602 - Subject Recruitment Practices	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00023: +SM 606 - Protected Health Information	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00024: +SM 601 - Human Subject Protection	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00025: +SM 605 - Adverse Device Effects Recognition and Reporting	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00026: +SM 604 - Specimen Management	100	YES	1/31/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00037 Rev B: Record Retention Procedure	100	YES	12/4/18	No
marcie@juul.com	Marcie	Hamilton	Dimensions of Data Privacy	100	YES	1/7/19	No
marcie@juul.com	Marcie	Hamilton	Good Documentation and Communication Practices	100	YES	1/7/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00047 Rev C: Complaint Handling Procedure	100	YES	1/29/19	No
marcie@juul.com	Marcie	Hamilton	WI-00031 Rev A: Change Request Work Instructions - Item, BOM, Sourcing	100	YES	1/30/19	No
marcie@juul.com	Marcie	Hamilton	SOP-00105 Rev A: Packaging Engineering Development Procedure	100	YES	2/10/19	No
marcie@juul.com	Marcie	Hamilton	POL-00011 Rev A: Anti-Money Laundering Policy	100	YES	2/16/19	No
marcie@juul.com	Marcie	Hamilton	KnowBe4: Security Awareness Training	100	YES	2/25/19	No
marcie@juul.com	Marcie	Hamilton	WI-00033 Rev A: Non-Copy: Packaging Qualification Request Work Instruction	100	YES	3/15/19	No
marcie@juul.com	Marcie	Hamilton	WI-00034 Rev A: Alternate Supplier Sourcing: Packaging Qualification Request Work Instruction	100	YES	3/15/19	No
marcie@juul.com	Marcie	Hamilton	WI-00035 Rev A: Copy: Packaging Qualification Request Work Instruction	100	YES	3/15/19	No
marcie@juul.com	Marcie	Hamilton	WI-00036 Rev A: Structural - Paper: Packaging Qualification Request Work Instruction	100	YES	3/15/19	No
marcie@juul.com	Marcie	Hamilton	WI-00037 Rev A: Structural - Blister: Packaging Qualification Request Work Instruction	100	YES	3/15/19	No
marcie@juul.com	Marcie	Hamilton	WI-00038 Rev A: Non-Mechanical Document Change: Packaging Qualification Request Work Instruction	100	YES	3/15/19	No
marcie@juul.com	Marcie	Hamilton	POL-00013 Rev A: Conflicts of Interest Policy	100	YES	3/15/19	No
marcie@juul.com	Marcie	Hamilton	POL-00010 Rev B: Global Anti-Bribery Anti-Corruption Policy	0	NO		No
marcie@juul.com	Marcie	Hamilton	POL-00015 Rev A: Global Anti-Harassment Policy	100	YES	3/15/19	No

Username	First Name	Last Name	Course Active?	Course Title	Course Assigned Date	Course Percentage	Course Complete?	Date Course Completed	Course Overdue?	Course Due Date	People.Manager
jisaacson@juul.com	Jim	Isaacson	YES	JUUL Quality Policy	5/24/2018	100	YES	6/1/2018 17:24	NO	6/7/2018	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00035 v2.0: Regulatory Agency Inspections Procedure	7/13/2020	0	NO		YES	7/27/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00160 v1.0: Managing Requests for Regulatory Agency Inspections Work Instruction	7/13/2020	0	NO		YES	7/27/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	Checklist For Invoice Approvals	7/22/2020				NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00040 v2.0 Global Contract Management Procedure	6/2/2020	0	NO		YES	6/16/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00148 v1.0 Corrective and Preventive Action (CAPA) Review Board Work Instruction	8/6/2020	0	NO		NO	8/20/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00019 v3.0: Global Travel and Expense (T&E) Policy	6/9/2020	0	NO		YES	6/23/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00106 v2.0: Change Control - Change Assessment Form (CAF) Work Instructions	6/26/2020	0	NO		YES	7/10/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00216 v3.0: Change Control - Change Control Board (CCB) Review Procedure	6/26/2020	0	NO		YES	7/10/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	JUUL Information Security Policy Framework	7/13/2020	0	NO		NO	8/12/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00006 Rev B: Grants Policy	4/16/2020	0	NO		YES	4/30/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00038 v1.0: Health and Safety Policy	5/7/2020	0	NO		NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00002 v3.0 Global Purchasing Policy	6/2/2020	0	NO		YES	6/16/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00041 Rev A: Promotional and Informational Review Committee (PIRC) Policy	2/10/2020	0	NO		YES	2/24/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00047 Rev E Complaint Handling Procedure	2/14/2020	0	NO		YES	2/28/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00063 Rev C Health Hazard Evaluation Procedure	2/14/2020	0	NO		YES	2/28/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00113 Rev A: Health Hazard Evaluation Work Instructions	3/2/2020	0	NO		NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00038 Rev B: Management Review Procedure	3/12/2020	0	NO		YES	3/26/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00122 Rev A: Test Method Validation Procedure	10/16/2019	0	NO		YES	10/30/2019	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00172 Rev A: Quality Management System Data Analysis Procedure	10/30/2019	0	NO		YES	11/13/2019	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00092 Rev A: Complaint Review Board Work Instructions	1/23/2020	0	NO		YES	2/6/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00215 Rev A Production and Process Controls Procedure	1/28/2020	0	NO		YES	2/11/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	Youth Prevention Training Certification	9/20/2019	100	YES	9/23/2019 15:31	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00128 Rev A: Deviation Management Procedure	9/12/2019	100	YES	9/19/2019 3:25	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	Smoke/Vapor-Free Workplace Policy	9/28/2019	100	YES	10/7/2019 15:28	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00003 Rev B: Design Reviews Work Instructions	9/26/2019	100	YES	9/26/2019 23:48	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00012 Rev B: Design Verification and Validation Work Instructions	9/26/2019	100	YES	9/26/2019 23:49	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00041 Rev A: Risk Management Workbook Work Instruction	7/24/2019	100	YES	7/29/2019 19:42	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00163 Rev A: Statistical Methods for Product Development Procedure	7/29/2019	100	YES	7/29/2019 19:40	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00006 Rev B: Risk Management Procedure	9/11/2019	100	YES	9/19/2019 3:22	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00001 Rev B: Design Control Procedure	9/11/2019	100	YES	9/19/2019 3:21	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00005 Rev B: Design History File Work Instructions	9/25/2019	100	YES	10/3/2019 17:13	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00133 Rev A: Equipment Out of Tolerance Look Back Procedure	7/10/2019	100	YES	7/18/2019 14:38	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00019 Rev A: External Communications Policy	7/12/2019	100	YES	7/22/2019 20:43	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00001 Rev A: Social Media Policy	7/12/2019	100	YES	7/22/2019 20:38	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	REF-00018 Rev A: Data Protection Impact Assessment (DPIA) Guidelines	6/24/2019	100	YES	7/2/2019 23:29	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	REF-00019 Rev A: Privacy by Design and Default Guidelines	6/24/2019	100	YES	7/2/2019 23:36	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	REF-00022 Rev A: Data Subject Rights Guidelines	6/24/2019	100	YES	7/2/2019 23:47	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00130 Rev A: Personal Data Breach Procedure	6/24/2019	100	YES	7/2/2019 23:49	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00055 Rev B: Supplier Corrective Action (SCAR) Procedure	7/12/2019	100	YES	7/22/2019 20:48	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	Privacy and Data Protection	12/16/2019	0	NO		YES	1/20/2020	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	REF-00020 Rev A: Entertainment Guidelines - Americas	6/12/2019	100	YES	6/20/2019 22:49	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00017 Rev A: Corporate Sponsorships Policy	6/18/2019	100	YES	6/20/2019 22:50	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00018 Rev A Privacy and Data Handling Policy	6/24/2019	100	YES	7/2/2019 23:21	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00016 Rev A: U.S. Anti-Trust Compliance Policy and Guidelines	5/15/2019	100	YES	5/28/2019 15:39	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00008 Rev A: Global Trade Compliance Policy	5/15/2019	100	YES	5/28/2019 15:37	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00035 Rev A: Statistical Techniques Procedure	5/22/2019	100	YES	5/28/2019 16:22	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	JUUL Labs Code of Conduct	5/22/2019	100	YES	5/28/2019 15:49	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00037 Rev C: Record Retention Procedure	4/26/2019	100	YES	4/25/2019 7:00	NO	5/10/2019	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00010 Rev B: Global Anti-Bribery Anti-Corruption Policy	3/13/2019	100	YES	3/13/2019 22:44	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00015 Rev A: Global Anti-Harassment Policy	3/15/2019	100	YES	3/26/2019 22:50	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00057 Rev A: Good Documentation Practices Procedure	3/22/2019	100	YES	4/2/2019 21:10	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00073 Rev A: Receiving Control Procedure	4/3/2019	100	YES	4/15/2019 17:21	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00048 Rev B: Internal Audit Procedure	4/11/2019	100	YES	4/22/2019 23:33	NO		John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00034 Rev A: Alternate Supplier Sourcing: Packaging Qualification Request Work Instruction	3/6/2019	100	YES	3/13/2019 22:34	NO		John Daley



jisaacson@juul.com	Jim	Isaacson	YES	WI-00035 Rev A: Copy: Packaging Qualification Request Work Instruction	3/6/2019	100	YES	3/13/2019 22:35	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00036 Rev A: Structural - Paper: Packaging Qualification Request Work Instruction	3/6/2019	100	YES	3/13/2019 22:36	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00037 Rev A: Structural - Blister: Packaging Qualification Request Work Instruction	3/6/2019	100	YES	3/13/2019 22:36	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00038 Rev A: Non-Mechanical Document Change: Packaging Qualification Request Work Instruction	3/6/2019	100	YES	3/13/2019 22:37	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00013 Rev A: Conflicts of Interest Policy	3/7/2019	100	YES	3/13/2019 22:41	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	KnowBe4: Security Awareness Training	2/19/2019	100	YES	3/11/2019 22:07	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00031 Rev A: Change Request Work Instructions - Item, BOM, Sourcing	1/29/2019	100	YES	2/4/2019 16:16	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00011 Rev A: Anti-Money Laundering Policy	2/14/2019	100	YES	2/25/2019 22:27	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00007 Rev A: Process Validation Procedure	2/21/2019	100	YES	3/4/2019 20:12	NO	3/7/2019 John Daley
jisaacson@juul.com	Jim	Isaacson	YES	WI-00033 Rev A: Non-Copy: Packaging Qualification Request Work Instruction	3/6/2019	100	YES	3/13/2019 22:33	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00007 Rev A: Compliance Reporting and Investigation Policy	11/12/2018	100	YES	11/19/2018 22:34	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	Good Documentation and Communication Practices	12/18/2018	100	YES	1/9/2019 17:13	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00062 Rev C: Field Action Procedure	10/11/2018	100	YES	10/11/2018 23:33	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	YES	POL-00003 Rev A: Supplier Management Policy	7/16/2018	100	YES	7/18/2018 16:36	NO	7/30/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	YES	JUUL Quality System Overview	6/13/2018	100	YES	6/18/2018 22:47	NO	6/27/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	YES	SOP-00065 Rev A: Quality Planning	6/21/2018	100	YES	6/25/2018 14:14	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00005 Rev A: Document Control Procedure	5/21/2018	100	YES	6/1/2018 15:03	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00038 Rev A: Management Review Procedure	7/5/2018	100	YES	7/6/2018 19:48	NO	7/19/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00034 Rev A: Regulatory Agency Inspections Procedure	6/13/2018	100	YES	6/25/2018 14:07	NO	6/27/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	MAN-00001 Rev A: Quality Manual	6/13/2018	100	YES	6/21/2018 21:24	NO	6/27/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00027 Rev A: Training Procedure	6/13/2018	100	YES	6/21/2018 23:10	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00216 v 2.0: Change Control Board (CCB) Review Procedure	6/1/2020	0	NO	YES		6/15/2020 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00216 v 1.0: Change Control Board (CCB) Review Procedure	5/5/2020	0	NO	YES		5/19/2020 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00106 v 1.0: Change Assessment Form (CAF) Work Instructions	6/1/2020	0	NO	YES		6/15/2020 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	POL-00009 Rev B: Global Travel and Expense (T&E) Policy	2/11/2020	0	NO	YES		2/25/2020 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00044 Rev E: Supplier Evaluation, Qualification, and Monitoring Procedure	10/22/2019	0	NO	YES		11/5/2019 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00032 Rev B: Change Assessment Form (CAF) Work Instructions	1/7/2020	0	NO	YES		1/21/2020 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00053 Rev B: Engineering Change Control Procedure	10/3/2019	100	YES	10/7/2019 17:22	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00049 Rev A: Supplier Change Request Work Instruction	8/5/2019	100	YES	8/16/2019 14:25	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00040 Rev A: Equipment Management Procedure	7/10/2019	100	YES	7/18/2019 14:35	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00049 Rev A: Control of Nonconforming Product Procedure	7/16/2019	100	YES	7/18/2019 14:51	NO	7/30/2019 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00044 Rev D: Supplier Evaluation, Qualification and Monitoring Procedure	8/5/2019	100	YES	8/16/2019 14:28	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00006 Rev A: Risk Management Procedure	7/1/2019	100	YES	7/2/2019 23:51	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00005 Rev D: Document Control Procedure	6/6/2019	100	YES	6/20/2019 22:45	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00047 Rev D: Complaint Handling Procedure	6/12/2019	100	YES	6/20/2019 22:47	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00053 Rev A: Engineering Change Control Procedure	9/11/2019	100	YES	9/19/2019 3:23	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00032 Rev A: Change Assessment Form (CAF) Work Instructions	6/3/2019	100	YES	6/20/2019 22:45	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00001 Rev A: Design Control Procedure	4/22/2019	100	YES	4/25/2019 21:36	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00003 Rev A: Design Reviews Work Instructions	4/22/2019	100	YES	4/25/2019 22:17	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00005 Rev A: Design History File Work Instructions	4/22/2019	100	YES	4/25/2019 21:43	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00012 Rev A: Design Verification and Validation Work Instructions	4/22/2019	100	YES	4/25/2019 22:20	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	POL-00006 Rev A: Grants and Charitable Contributions Policy	4/18/2019	100	YES	4/25/2019 21:23	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00005 Rev C: Document Control Procedure	3/22/2019	100	YES	4/2/2019 21:00	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00047 Rev C: Complaint Handling Procedure	1/22/2019	100	YES	2/4/2019 16:12	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	POL-00010 Rev A: Global Anti-Bribery Anti-Corruption Policy	11/19/2018	100	YES	11/26/2018 16:11	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00037 Rev B: Record Retention Procedure	12/4/2018	100	YES	12/4/2018 22:36	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	Dimensions of Data Privacy	12/17/2018	100	YES	1/18/2019 22:29	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00044 Rev C: Supplier Evaluation, Qualification and Monitoring Procedure	1/10/2019	100	YES	1/18/2019 22:31	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	MAN-00001 Rev B: Quality Manual	9/18/2018	100	YES	9/18/2018 22:57	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00037 Rev A: Record Retention Procedure	9/12/2018	100	YES	9/18/2018 14:50	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00047 Rev B: Complaint Handling Procedure	10/4/2018	100	YES	10/5/2018 19:53	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	POL-00002 Rev B: Purchasing Policy	10/17/2018	100	YES	10/29/2018 17:20	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	POL-00009 Rev A: Travel and Expense (T&E) Policy	10/17/2018	100	YES	10/29/2018 18:21	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	WI-00028 Rev A: Post Market Clinical Analyst Work Instructions	11/9/2018	100	YES	11/19/2018 22:27	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00005 Rev B: Document Control Procedure	7/19/2018	100	YES	7/30/2018 20:23	NO	8/2/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00062 Rev B: Field Action Procedure	8/20/2018	100	YES	8/23/2018 21:50	NO	John Daley



jisaacson@juul.com	Jim	Isaacson	NO	SOP-00063 Rev B: Health Hazard Evaluation Procedure	8/20/2018	100	YES	8/20/2018 17:36	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00042 Rev A: Contract Management Procedure	8/21/2018	100	YES	8/23/2018 17:27	NO	9/4/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00044 Rev B: Supplier Evaluation Qualification Procedure	10/11/2018	100	YES	10/11/2018 23:45	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00062 Rev A: Field Action Procedure	10/12/2018	100	YES	7/9/2018 19:10	NO	10/26/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00048 Rev A: Internal Audit Procedure	7/5/2018	100	YES	7/9/2018 17:08	NO	7/19/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00047 Rev A: Complaint Handling Procedure	7/9/2018	100	YES	7/9/2018 23:01	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	POL-00002 Rev A: Purchasing Policy	7/14/2018	100	YES	7/16/2018 23:19	NO	7/28/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00050 Rev A: Corrective and Preventative Action (CAPA) Procedure	7/12/2018	100	YES	7/16/2018 17:47	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00044 Rev A: Supplier Evaluation Qualification Procedure	7/16/2018	100	YES	7/23/2018 18:53	NO	John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00055 Rev A: Supplier Corrective Action (SCAR) Procedure	7/16/2018	100	YES	7/23/2018 20:01	NO	7/30/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00054 Rev A: Supplier Audit Procedure	7/9/2018	100	YES	7/9/2018 17:23	NO	7/23/2018 John Daley
jisaacson@juul.com	Jim	Isaacson	NO	SOP-00063 Rev A: Health Hazard Evaluation Procedure	6/21/2018	100	YES	6/25/2018 14:11	NO	7/5/2018 John Daley